## EXHIBIT 1

## UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS Dallas Division

CHARLENE CARTER,

Civil Case No. 3:17-cv-02278-X

Plaintiff,

V.

SOUTHWEST AIRLINES CO., AND TRANSPORT WORKERS UNION OF AMERICA, LOCAL 556,

Defendants.

## **DECLARATION OF MATTHEW D. HILL**

Pursuant to 28 U.S.C. § 1746, I, Matthew D. Hill, declare under penalty of perjury under the laws of the United States of America that the following statements are true and correct:

- 1. My name is Matt Hill and if called to testify I could testify as follows:
- 2. I am an attorney licensed in Texas and represent Charlene Carter in this case.
- 3. I am over the age of 21, of sound mind, and capable of making this declaration. The facts stated herein are true and correct and are within my personal knowledge.
- 4. During an early-morning July 3, 2022 phone conversation between fellow Carter attorney Matthew Gilliam, Southwest's Paulo McKeeby, and me, I suggested to Mr. McKeeby that Southwest pull Brian Talburt from a flight that conflicted with the time of his 1:00 p.m. July 3, 2022 deposition and, instead, allow a reserve flight attendant to carry out his duties for his scheduled trip.

Executed	on	August	9,	2022.
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/s/ Matthew D. Hill
MATTHEW D. HILL